

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate And Fee Changes, 1997

Docket No. R97-1

**INTERROGATORIES OF
ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS CARL L. DEGAN
(ANM/USPS-ST47-1 -5)
November 14, 1997**

Pursuant to Rules 25 and 26 of the Rules of Practice and Procedure of this Commission and Order 1200, the Alliance of Nonprofit Mailers hereby submits the following interrogatories and requests for production.

ANM/USPS-ST47-1.

Please refer to the discussion in LR-H-146, p II-3, of distribution items where the contents are counted.

- a. When an IOCS tally is taken and the clerk or mailhandler is handling an item of mixed-mail, for which types of items and under what conditions is the mixed-mail counted?
- b. Suppose a clerk is handling an item such, as a sack, that contains other items, such as bundles, of mixed-mail. When a tally is taken under such circumstances, (i) is all mail in the sack counted, or (ii) is the mail in selected bundles within the sack counted?
- c. Please explain if there are situations involving items where mixed-mail may, or may not, be counted.

ANM/USPS-ST47-2.

When an IOCS tally is taken and the clerk or mailhandler is handling a container of mixed-mail, are there types of containers or conditions under which the mixed-mail is counted? If so please describe.

ANM/USPS-ST47-3.

At page II-2 of LR-H-146, a note states that IOCS tallies are divided into three facility types: MODS 1&2, BMCS, and NON-MODS. Can counted mixed-mail tallies be taken at any of these three types of facilities, or is counting of mixed-mail restricted to one or two types of facilities? Please explain.

ANM/USPS-ST47-4.


- a. When mixed-mail is counted for purposes of creating an IOCS tally, are separate "tallies" created for each subclass of mail, or is all information concerning the mail count recorded in a single tally?
- b. If counting of mixed-mail results in creation of more than one "separate tally," please provide the total number of such mixed-mail tallies included in the tallies in LR-H-23 for Standard A (i) Regular ECR, (ii) Regular non-ECR, (iii) Nonprofit ECR and (iv) Nonprofit non-ECR.
- c. The total number of "separate" counted mixed-mail tallies for Standard A mail represents how many actual individual, independent observations by an IOCS tally clerk?

ANM/USPS-ST47-5

Do mail processing IOCS tallies in LR-H-23 include counted mixed-mail tallies? If so, please identify and describe all fields that distinguish counted mixed-mail tallies from direct tallies that

deal with only one class of mail (e.g., single-piece tallies, or tallies where all the mail in the item or container is identical).

Respectfully submitted,



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November 14, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



November 14, 1997